

From: [Glum, Scott](#)
To: [Linnear, David](#)
Subject: RE: Pristine Meeting Draft Agenda Topics
Date: Friday, January 19, 2018 8:53:00 AM

OK cool. Please send call-in number and meeting time when you have it. Thanks David.

-Scott

Scott Glum

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From: Linnear, David [mailto:linnear.david@epa.gov]
Sent: Thursday, January 18, 2018 6:54 PM
To: Glum, Scott <scott.glum@epa.ohio.gov>
Subject: RE: Pristine Meeting Draft Agenda Topics

Scott,
Thanks. I incorporated some of these comments in EPA response to PRP. You are officially invited ☺
David

From: scott.glum@epa.ohio.gov [mailto:scott.glum@epa.ohio.gov]
Sent: Thursday, January 18, 2018 11:31 AM
To: Linnear, David <linnear.david@epa.gov>
Subject: RE: Pristine Meeting Draft Agenda Topics

Hey David. Here is my take on agenda items 2 and 3:

2. Local Groundwater Status

a. City of Reading Former Well Field – *The well field shut down in 1994 due to 1,2-DCA contamination from Pristine. Reading now gets its water from Greater Cincinnati Water Works, the main source of which is the Ohio River. If/when ground water is restored to beneficial use, Reading could potentially start pumping again. This would require approval from Ohio EPA Division of Drinking Water.*

b. City of Wyoming Well Field – *This well field has been impacted by low levels of VOCs*

from General Electric (GE) site, not Pristine. GE installed air stripper treatment at Wyoming water treatment plant to address vinyl chloride from GE. GE is pumping and treating ground water on the GE property under a USEPA RCRA corrective action, but to my knowledge the extent of ground water contamination beyond the GE property has not been delineated or addressed. USEPA has apparently not pushed GE to delineate or clean up their off-property plume. This seems unfair from Pristine's point of view. Be aware that GE is also a PRP at Pristine.

c. Downgradient Groundwater Use - *Pristine Trust will likely argue that cleanup of the Pristine ground water plume in a timely manner is not critical since there are no downgradient potable use wells. Everybody downgradient of Pristine gets drinking water from Greater Cincinnati Water Works (Ohio River). There may be a few downgradient industrial facilities that pump ground water for industrial use only (e.g. non-contact cooling water), but these are not likely to be impacted by Pristine plume. The impacted aquifer (Mill Creek Aquifer) is not a federally designated sole-source aquifer, but NCP still views ground water as a critical resource to be restored to beneficial use in a reasonable time frame.*

d. Institutional Controls – *I believe that Reading and other downgradient communities have local ordinances that prevent installation of potable use wells within their city limits. Pristine Trust will likely argue that this is like an IC that restricts ground water use for potable purposes and prevents people from being exposed to Pristine contaminants.*

3. Reassessment of Remediation Strategy

a. Regulatory Options for the Off-Site Plume – *Not a lot of options here. Either allow more time to evaluate MNA as viable remedial option (perhaps require some additional new monitoring wells to better evaluate MNA), or restart off-property ground water extraction at EW-5 or EW-3. NCP is pretty clear about restore to beneficial use in reasonable time frame. However, Pristine Trust may point to the flexibility offered by more recent USEPA guidance (e.g. The Groundwater Remedy Completion Strategy).*

b. Other Options – *Supplement existing remedy with new treatment technology (e.g. injection of an appropriate amendment to promote degradation)*

I'll be around between 1:00 and 3:00 pm Eastern today, but then have to go to a site and retrieve Summa cans. Can also talk tomorrow.

Scott Glum

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To: Glum, Scott <scott.glum@epa.ohio.gov>
Subject: FW: Pristine Meeting Draft Agenda Topics

From: Ronald Pitzer [<mailto:trusteerlp@gmail.com>]
Sent: Wednesday, January 17, 2018 1:53 PM
To: Linnear, David <linnear.david@epa.gov>
Cc: Short, Thomas <short.thomas@epa.gov>; Elizabeth L DuSold <dusold_elizabeth_l@lilly.com>; Ronald Pitzer <trusteerlp@gmail.com>
Subject: Pristine Meeting Draft Agenda Topics

David,

Per our conversation last week, the Pristine Trustees met yesterday and discussed topics to be included in the agenda for the February 6 meeting. The Trustees considered the information you provided by phone last week plus the information Tom provided in his 1/12/18 email. I am sending you these topics for your consideration prior to the call you and I have planned later this week.

The Pristine Trustees propose the following topics for the February 6 meeting:

1. Introduction
2. Local Groundwater Status
 - a. City of Reading Former Well Field
 - b. City of Wyoming Well Field
 - c. Downgradient Groundwater Use
 - d. Institutional Controls
3. Reassessment of Remediation Strategy
 - a. Regulatory Options for the Off-Site Plume
 - b. Other Options
4. Overview of MNA Comments from Agency
5. Approach Forward

I look forward to our call later this week to review these topics and other topics the Agency wants to discuss.

Ron

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up to 50% less likely to use. Start the conversation:
StartTalking.Ohio.Gov



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